

POLICY BRIEF

HF 2112 is Unnecessary, Costly, and Harmful



HF 2112 would require all non-citizen applicants for public assistance programs in the state of Iowa to be verified through the Systematic Verification for Entitlements (SAVE) program administered by the United States Department of Homeland Security (DHS) and add a vague “smuggling” provision to criminal code.

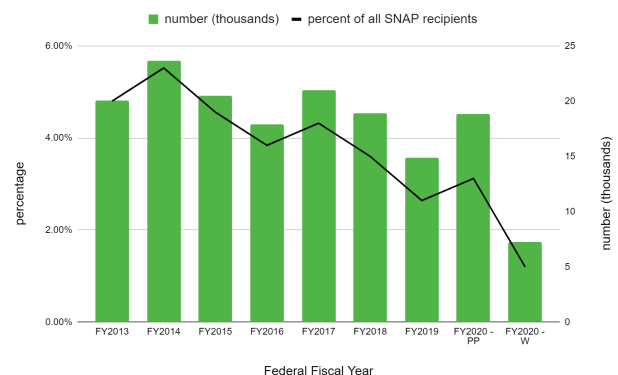
HF 2112 would add unnecessary barriers to access public assistance while increasing costs to the state.

- Iowa already utilizes the SAVE system to verify non-citizen status for public assistance programs— Supplemental Nutrition Assistance Program (SNAP)¹, Family Investment Program (FIP/TANF)², Hawk-i³, and Medicaid⁴—when it cannot be verified by other authorized means.
- While SAVE can produce results quickly, that is not always the case. The additional verification response time for SAVE is seven federal workdays⁵, and in some cases, can take 10-20 federal workdays⁶. When Iowa is already severely out of compliance with federal requirements related to SNAP application processing timeliness⁷, we cannot afford to create additional hurdles and delays.
- Using the SAVE system can be costly to states. In FY 2024, the non-federal agency charge per verification case for SAVE was \$1.00, but that is set to triple to \$3.10 per case by FY 2028⁸.

The bill would further chill participation in public assistance programs in mixed-status households.

- SNAP participation among eligible citizen children living with a non-citizen has fallen considerably in the last few years⁹, especially following the “public charge” final rule announcement in August 2019 (which was later reversed in September 2022).
- HF 2112 reinforces harmful anti-immigrant rhetoric that may prevent mixed-status households from enrolling eligible children in SNAP and other public assistance programs.

Citizen children living with a non-citizen as a share of total SNAP recipients in the state of Iowa



HF 2112 could cause confusion and fear among organizations assisting immigrant populations.

- Vague language in the “smuggling” provision (Division II) is cause for concern among organizations providing assistance to immigrant populations, and could contribute to racial profiling.
- The bill could inhibit many nonprofit organizations from fulfilling their missions and providing vital services across Iowa’s communities, rural and urban alike.

1. *Employee Manual, Title 7, Chapter I: "SNAP Specific Households and Participants."* State of Iowa Department of Health and Human Services. October 21, 2022.
2. *Employee Manual, Title 4, Chapter L: "Family Investment Program Aliens and Migrants."* State of Iowa Department of Health and Human Services. November 4, 2022.
3. *Employee Manual, Title 5, Chapter E: "Healthy and Well Kids in Iowa (hawk-i) - Nonfinancial Eligibility Factors."* State of Iowa Department of Health and Human Services. July 3, 2009.
4. *Employee Manual, Title 8, Chapter L: "Medicaid Aliens."* State of Iowa Department of Health and Human Services. May 12, 2023.
5. *SAVE. US Citizenship and Immigration Services.* <https://www.uscis.gov/save>. Accessed January 29, 2024.
6. *SAVE Verification Process. Saev Hernandez Immigration Practice.* <https://www.shipimmigration.com/save-verification-process/>. Accessed January 29, 2024.
7. *SNAP Application Processing Timeliness - Corrective Action Plan Letter to Iowa Department of Health and Human Services.* US Department of Agriculture, Food and Nutrition Service, Midwest Regional Office. November 21, 2023.
8. *SAVE Transaction Charges. US Citizenship and Immigration Services.* <https://www.uscis.gov/save/about-save/save-transaction-charges>. Accessed January 29, 2024.
9. *Characteristics of SNAP Households: FY 2020 and Early Months of the COVID 19 Pandemic.* U.S. Department of Agriculture, Food and Nutrition Service. June 2022.